

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

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Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**PLAN SUPPLEMENT FOR THE FOURTH AMENDED JOINT CHAPTER 11 PLAN OF
YELLOW CORPORATION AND ITS DEBTOR AFFILIATES PURSUANT TO
CHAPTER 11 OF THE BANKRUPTCY CODE PROPOSED BY THE DEBTORS AND THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

This Plan Supplement contains drafts of the following documents, each of which remains subject to ongoing review and negotiations pursuant to the terms of the Plan.²

<u>Exhibit</u>	<u>Description</u>
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|--------|--|
| A | Schedule of Assumed Executory Contracts and Unexpired Leases |
| B | Schedule of Retained Causes of Action |
| B(i) | Claims Related to Insurance Contracts and Policies |
| B(ii) | Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation |
| B(iii) | Claims Related to Accounts Receivable |

The Debtors and the Committee reserve all rights, with the consent of any applicable counterparties (to the extent required under the Plan) to amend, revise, or supplement all of the documents included herein as provided in the Plan.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Plan.

Exhibit A

Schedule of Assumed Executory Contracts and Unexpired Leases

The Debtors have included a schedule of Executory Contracts and Unexpired Leases that they may potentially assume as of the Effective Date or assume and assign in accordance with the Plan's treatment of Executory Contracts and Unexpired Leases. The Debtors reserve their right to alter, amend, modify, or supplement this Exhibit A in accordance with the terms of the Plan, including with respect to cure amounts based on continuing negotiations between the Debtors and interested parties with respect thereto.

Pursuant to Article V.A of the Plan, on the Effective Date pursuant to sections 365 and 1123 of the Bankruptcy Code, each Executory Contract or Unexpired Lease not previously assumed, assumed and assigned, or rejected, shall be deemed automatically rejected, unless such Executory Contract or Unexpired Lease: (1) is identified on an Assumed Executory Contracts and Unexpired Leases Schedule; (2) is the subject of a motion to assume (or assume and assign) such Executory Contract that is pending on the Confirmation Date; (3) is a contract, instrument, release, indenture, or other agreement or document entered into in connection with the Plan; (4) is a directors and officers insurance policy; (5) is a Third-Party Sale Transaction Document; or (6) is to be assumed by the Debtors and assigned in connection with a Third-Party Sale Transaction and pursuant to the Third-Party Sale Transaction Documents.

Entry of the Confirmation Order by the Bankruptcy Court shall constitute an order approving the assumptions, assumptions and assignments, or rejections of the Executory Contracts or Unexpired Leases pursuant to the Plan; *provided* that neither the Plan nor the Confirmation Order is intended to or shall be construed as limiting the Debtors' or the Estates' authority under the Third-Party Sale Transaction Documents to assume and assign Executory Contracts and Unexpired Leases pursuant to the Third-Party Sale Transaction Documents. Any motions to assume Executory Contracts or Unexpired Leases pending on the Effective Date shall be subject to approval by the Bankruptcy Court on or after the Effective Date but may be withdrawn, settled, or otherwise prosecuted by the Liquidating Trustee. Each Executory Contract and Unexpired Lease assumed pursuant to Article V.A of the Plan or by any order of the Bankruptcy Court, which has not been assigned to a third party prior to the Effective Date, shall revert in and be fully enforceable by the Liquidating Trustee in accordance with its terms, except as such terms are modified by the provisions of the Plan or any order of the Bankruptcy Court authorizing and providing for its assumption under applicable federal law.

Notwithstanding anything to the contrary in the Plan or the Third-Party Sale Transaction Documents, the Debtors and the Committee reserve the right to alter, amend, modify, or supplement the Assumed Executory Contracts and Unexpired Leases Schedule in the Plan Supplement. The Debtors and the Committee shall provide notice of any amendments to the Assumed Executory Contracts and Unexpired Leases Schedule to the parties to the Executory Contracts or Unexpired Leases affected thereby. For the avoidance of doubt, Article V of the Plan relates to Executory Contracts or Unexpired Leases other than such agreements previously assumed, assumed and assigned, or rejected.

Contract Counterparty	Contract Description	Legal Entity	Curable Dollars	Assume / Reject
1099 Pro, Inc	1099 Pro Enterprise Single User Subscription	YRC Enterprise Services, Inc.	-	Assume
3GTMS	3G TMS Yellow Logistics	YRC Enterprise Services, Inc.	76,460.00	Assume
ADP LLC	MASTER SERVICES AGREEMENT DATED 01/09/2020	YRC Enterprise Services, Inc.	74,929.07	Assume
ADP LLC	MASTER SERVICES AGREEMENT DATED 11/01/2021	YRC Inc.	-	Assume
Advanced Records Management Inc	Mainframe tape (records) backup	Yellow Corporation	617.56	Assume
Amazon Web Services, Inc.	Amazon AWS service charges	YRC Enterprise Services, Inc.	111,380.55	Assume
American Registry for Internet Numbers LTD	Annual Fee for IPv4 Registration Services Plan 2X-SMALL for ROADWA-2	YRC Enterprise Services, Inc.	-	Assume
American Registry for Internet Numbers LTD	Annual Maintenance for IPV4 End User-YRCIN	YRC Enterprise Services, Inc.	-	Assume
BLOOMBERG BNA	HR & Payroll Resource Center – Payroll Library (HRRC06)	YRC Enterprise Services, Inc.	-	Assume
Cavern Technologies	Rent/Lease for space where Mainframe is located	YRC Enterprise Services, Inc.	37,124.72	Assume
CHICAGO SOFT	MVS Quick Ref	YRC Enterprise Services, Inc.	-	Assume
Cost Control Associates, Inc.	Master Business Agreement dated 5/15/2010 and all amendments	YRC Enterprise Services, Inc.	8,237.80	Assume
CT Corp	Customer Agreement	Yellow Corporation	-	Assume
Delinea	Password vaulting	YRC Enterprise Services, Inc.	-	Assume
DELL Technologies	Dell Technologies ProSupport Plus - Mobile Precision 5470 - Qty 21	YRC Enterprise Services, Inc.	-	Assume
Digital Media Innovations, LLC	"Notified" - IR WEBSITES	YRC Enterprise Services, Inc.	1,329.46	Assume
Diligent Corporation	ACL Robotics Professional Platform Solution	YRC Enterprise Services, Inc.	-	Assume
ENTRUST, INC.	System certificates	YRC Enterprise Services, Inc.	-	Assume
FIDELITY INVESTMENTS INSTITUTIONAL OPERATI	MASTER SERVICES AGREEMENT	Yellow Corporation	-	Assume
Fis Avantgard Llc	GETPA D - IT amendment for 3 month extension to December 29, 2025	YRC Enterprise Services, Inc.	376.34	Assume
GitLab Inc.	Source code repo, Digital pipelines	YRC Enterprise Services, Inc.	-	Assume
GuidePoint Security	Firewall for wide area network	YRC Enterprise Services, Inc.	-	Assume
GuidePoint Security	F5 support for Big-IP, WAF	YRC Enterprise Services, Inc.	-	Assume
GuidePoint Security	Cloud VPN	YRC Enterprise Services, Inc.	2,647.75	Assume
GuidePoint Security	Security / Threat protection	YRC Enterprise Services, Inc.	-	Assume
HYLAND SOFTWARE	OnBase	YRC Enterprise Services, Inc.	-	Assume
IBM CORPORATION	External IP resolution (DNS)	YRC Enterprise Services, Inc.	-	Assume
IBM CORPORATION	IBM Tivoli Tape Optimizer S&S	YRC Enterprise Services, Inc.	-	Assume
IBM CORPORATION	Monthly mainframe MLC subscription based on usage	YRC Enterprise Services, Inc.	-	Assume
IN COM DATA SYSTEMS	Smart TS XL Global Enterprise License Annual Maintenance & Support	YRC Enterprise Services, Inc.	5,414.46	Assume
Insight Direct USA, Inc	Storage	YRC Enterprise Services, Inc.	-	Assume
Insight Direct USA, Inc	File storage switches / support	YRC Enterprise Services, Inc.	-	Assume
Insight Direct USA, Inc	NetApp A800 DR Site - PartnerSelect	YRC Enterprise Services, Inc.	-	Assume
Insight Direct USA, Inc	KCG -SupportEdge PartnerSelect - NetApp Security and Compliance -5 yr	YRC Enterprise Services, Inc.	-	Assume
Insight Direct USA, Inc	File storage / support	YRC Enterprise Services, Inc.	-	Assume
INT APP	INT APP IB-00158 Integration Builder	YRC Enterprise Services, Inc.	-	Assume
Iron Mountain - U.S.	Customer Agreement dated 06/13/05 and all amendments	YRC Enterprise Services, Inc.	39,090.50	Assume
Juniper Networks	Network Switch Maintenance	YRC Enterprise Services, Inc.	-	Assume
Kronos	MASTER SERVICES AGREEMENT DATED 04/25/2006	YRC Enterprise Services, Inc.	-	Assume
Lumifi Cyber Inc	Cyber security services	Yellow Corporation	19,161.29	Assume
MACKINNEY SYSTEMS INC	Batch to CICS - Production	YRC Enterprise Services, Inc.	-	Assume
MERRILL CONSULTANTS	Mainframe analytics	YRC Enterprise Services, Inc.	1,407.10	Assume
MICROSOFT CORPORATION	Azure cloud services	YRC Enterprise Services, Inc.	-	Assume
Mirantis	Subscriptions for Docker Containers - MCC, BB	YRC Enterprise Services, Inc.	-	Assume
Network Solutions , LLC, A Web.com Company	AdultBlock trademark labels	YRC Enterprise Services, Inc.	-	Assume
Network Solutions , LLC, A Web.com Company	Website Domain Name Registration	YRC Enterprise Services, Inc.	-	Assume
NSONE Inc	NS1 (I) External DNS Service - Recurring Charge NSONE Enterprise DNS Recurring Fee	YRC Enterprise Services, Inc.	104.60	Assume
Nutrient	PDF converter services	YRC Enterprise Services, Inc.	-	Assume
ONETOUCH	Faxing software: mainframe and website	YRC Enterprise Services, Inc.	-	Assume
ONETOUCH	Opentext Inc. - Rightfax	Yellow Corporation	2,340.88	Assume
OPTIV	Email anti-spam, threat protection (Proofpoint)	YRC Enterprise Services, Inc.	-	Assume
OPTIV	Load balancing / WAF	YRC Enterprise Services, Inc.	-	Assume
ORACLE AMERICA INC	MASTER SERVICES AGREEMENT DATED 01/28/2022	YRC Enterprise Services, Inc.	-	Assume
ORACLE AMERICA INC	MASTER SERVICES AGREEMENT DATED 01/28/2022	YRC Enterprise Services, Inc.	-	Assume
ORACLE AMERICA INC	MASTER AGREEMENT DATED 01/28/2022	YRC Enterprise Services, Inc.	398,379.41	Assume
ORACLE AMERICA INC	IT AGREEMENT DATED 11/25/2015	YRC Enterprise Services, Inc.	-	Assume
ORACLE AMERICA INC	IT AGREEMENT DATED 06/01/2021	YRC Enterprise Services, Inc.	-	Assume
ORACLE CORPORATION	Oracle & Oracle Priority Pay	YRC Enterprise Services, Inc.	-	Assume
Origian/Sirius Computer Solutions	Systems integration	YRC Enterprise Services, Inc.	-	Assume
PALO ALTO NETWORKS	MASTER SERVICES AGREEMENT DATED 12/14/2022	YRC Enterprise Services, Inc.	-	Assume
Patch My PC	End point patching -address vulnerabilities	YRC Enterprise Services, Inc.	-	Assume
POMEROY	Network Gear and lines CISCO SYSTEMS CAPITAL CORP	YRC Enterprise Services, Inc.	-	Assume
POMEROY	Network Gear and lines Cisco Meraki	YRC Enterprise Services, Inc.	-	Assume
POMEROY	Cisco Identity Services Engine Essentials - Subscription license	YRC Enterprise Services, Inc.	-	Assume
Precisely Software Inc	Mainframe sort utility	YRC Enterprise Services, Inc.	-	Assume
Precisely Software Inc	Developer API developer.precisely.com	YRC Enterprise Services, Inc.	-	Assume
Precisely Software Inc	Space Recovery System (SRS) & Allocation Control Center (EOFMARK function only)	YRC Enterprise Services, Inc.	3,099.76	Assume
Precisely Software Inc	Mainframe sort utility	YRC Enterprise Services, Inc.	-	Assume
Precisely Software Inc	Spectrum OnDemand	YRC Enterprise Services, Inc.	-	Assume
Proactive Solutions, Inc	Commvault Premium Support	YRC Enterprise Services, Inc.	-	Assume
ProShred Security/Vital Shred	MBA dated 5-11-2017 and all amendments	YRC Enterprise Services, Inc.	-	Assume
RINGCENTRAL INC	MASTER SERVICES AGREEMENT DATED 01/19/2022	YRC Enterprise Services, Inc.	-	Assume
RINGCENTRAL INC	MASTER AGREEMENT DATED 09/06/2021	YRC Inc.	-	Assume
RINGCENTRAL INC	MASTER AGREEMENT DATED 11/04/2022	YRC Enterprise Services, Inc.	-	Assume
Safety-Kleen Systems, Inc.	MBA dated 5-1-2019 and all amendments	YRC Enterprise Services, Inc.	34,636.73	Assume
SAS INSTITUTE INC	Business analytics / Reporting	YRC Enterprise Services, Inc.	-	Assume
SHI International Corp	Microsoft On-Prem Items	YRC Enterprise Services, Inc.	-	Assume
SHI International Corp	Microsoft Cloud Items	YRC Enterprise Services, Inc.	-	Assume
SHI International Corp	AD reporting & updating	YRC Enterprise Services, Inc.	-	Assume
SHI International Corp	Mapitude Desktop - 10 year perpetual licenses (Route creation)	YRC Enterprise Services, Inc.	-	Assume
Silverline Infosystems	Professional Services	YRC Enterprise Services, Inc.	-	Assume
Sirius Computer Solutions	Server automation / patching	YRC Enterprise Services, Inc.	-	Assume
Sirius Computer Solutions	Server automation / patching (RED HAT)	YRC Enterprise Services, Inc.	-	Assume
Sirius Computer Solutions	Kromprise Full Solution - 500TM	YRC Enterprise Services, Inc.	-	Assume
SIRIUS COMPUTER SOLUTIONS INC	IBM DR mainframe- z13s CBU	YRC Enterprise Services, Inc.	-	Assume
SIRIUS COMPUTER SOLUTIONS INC	PowerMax	YRC Enterprise Services, Inc.	34,179.89	Assume
SIRIUS COMPUTER SOLUTIONS INC	Mainfram report repo	YRC Enterprise Services, Inc.	-	Assume
SIRIUS COMPUTER SOLUTIONS INC	Mainframe support	YRC Enterprise Services, Inc.	-	Assume
SIRIUS COMPUTER SOLUTIONS INC	TechSmith Snagit Maintenance	YRC Enterprise Services, Inc.	-	Assume
Sirius Computer SOLUTIONS, LLC	Elastic Billable Nodes for a Platinum Subscription	YRC Enterprise Services, Inc.	-	Assume
SOLARWINDS INC	Systems / Network monitoring	YRC Enterprise Services, Inc.	-	Assume
SONATYPE	software repository manage	YRC Enterprise Services, Inc.	-	Assume
SYSTEMWARE INC	IT AGREEMENT DATED 07/27/2021	YRC Enterprise Services, Inc.	-	Assume
SYSTEMWARE INC	IT AGREEMENT DATED 12/31/2020	YRC Enterprise Services, Inc.	-	Assume
TECHNOLOGY GROUP SOLUTIONS, LLC	HPE SY TC Essential SVC -KCG-HPE Synergy Frames -SY480 blades CDC - Cavern Data Ce	YRC Enterprise Services, Inc.	34,242.99	Assume
THOMAS and COMPANY	MASTER SERVICES AGREEMENT	Yellow Corporation	8,608.70	Assume
Underground Vault and Storage	Storage lease agreement dated 09/24/2001 and all amendments	Yellow Corporation	304.22	Assume
UPS	Customer Agreement Dated 02/22/2010	Yellow Corporation	4,223.60	Assume
US Cloud	Microsoft support	YRC Enterprise Services, Inc.	-	Assume
Wall Street Systems Delaware Inc	Treasury management	YRC Enterprise Services, Inc.	-	Assume

Exhibit B

Schedule of Retained Causes of Action

The provisions contained in this Exhibit B and the Plan Supplement remain subject to continuing negotiations among the Debtors and interested parties with respect thereto. The Debtors reserve all rights, with the consent of any applicable counterparties to the extent required under the Plan, to amend, revise, or supplement the Plan Supplement, and any of the documents and designations contained herein, at any time before the Effective Date of the Plan, or any such other date as may be provided for by the Plan or by order of the Bankruptcy Court. Each of the documents contained in the Plan Supplement or its amendments are subject to certain consent and approval rights to the extent provided in the Plan.

Article IV.N of the Plan provides:

Retained Causes of Action shall immediately vest with the Liquidating Trust as of the Effective Date, *provided* that, prior to the Effective Date, the Debtors shall not compromise, settle or release any such Retained Causes of Action without the consent of the Committee.

No Person or Entity may rely on the absence of a specific reference in the Plan, the Plan Supplement, the Confirmation Order, or the Disclosure Statement to any Cause of Action against them as any indication that the Debtors or the Liquidating Trustee, as applicable, will not pursue any and all available Causes of Action against them. The Debtors and the Liquidating Trustee, as applicable, expressly reserve all rights to prosecute any and all Causes of Action against any Person or Entity, except as otherwise expressly provided in the Plan, including Causes of Action that are not expressly identified in this Schedule of Retained Causes of Action. Unless any Cause of Action against a Person or Entity is expressly waived, relinquished, exculpated, released, compromised, or settled in the Plan or an order of the Bankruptcy Court, the Debtors and the Liquidating Trustee, as applicable, expressly reserve all Causes of Action, for later adjudication, and therefore, no preclusion doctrine, including the doctrines of res judicata, collateral estoppel, issue preclusion, claim preclusion, estoppel (judicial, equitable, or otherwise), or laches, will apply to such Causes of Action upon, after, or as a consequence of the confirmation or consummation of the Plan.

Notwithstanding and without limiting the generality of the foregoing and Article IV.N of the Plan, the Debtors and Liquidating Trustee, as applicable, expressly reserve all Causes of Action that are not expressly released under the Plan (including pursuant to Article IX thereof), including the following types of Causes of Action:

I. Claims Related to Insurance Contracts and Policies

Unless otherwise released under Article IX of the Plan, the Debtors and the Liquidating Trustee, as applicable, expressly reserve and retain all Causes of Action based in whole or in part upon any and all insurance contracts and Insurance Policies to which any Debtor or the Liquidating Trustee is a party or pursuant to which any Debtor or the Liquidating Trustee has any rights whatsoever, regardless of whether such contract or policy is specifically identified in the Plan, this Plan Supplement, or any amendments hereto or thereto, including, without

limitation, Causes of Action against Insurers, insurance carriers, reinsurance carriers, insurance brokers, underwriters, occurrence carriers, or surety bond issuers relating to coverage, indemnity, contribution, reimbursement, or any other matters. Without limiting the generality of the foregoing, the Debtors expressly reserve and retain all Causes of Action against the Entities identified in **Schedule B(i)** attached hereto.

II. Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation

Unless otherwise released under Article IX of the Plan, or settled pursuant to Bankruptcy Rule 9019, the Debtors and the Liquidating Trustee, as applicable, expressly reserve and retain all Causes of Action against or related to all Entities that are party to or that may in the future become party to litigation, arbitration, or any other type of adversarial proceeding or dispute resolution proceeding, whether formal or informal or judicial or non-judicial, regardless of whether such Entity is specifically identified in the Plan, the Plan Supplement, or any amendments hereto or thereto[, including, without limitation, any Causes of Action, defenses, cross claims, or counterclaims subject to the ADR Procedures].^{3, 4} Without limiting the generality of the foregoing, the Debtors expressly reserve all Causes of Action against the Entities identified in **Schedule B(ii)** attached hereto.

III. Causes of Action Related to Accounts Receivable Claims

Unless otherwise released under Article IX of the Plan, the Debtors and the Liquidating Trustee, as applicable, expressly reserve and retain all Causes of Action, against or related to all Entities that owe or that may in the future owe money to the Debtors or the Liquidating Trust, as applicable, regardless of whether such Entity is expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto. Without limiting the generality of the foregoing, the Debtors expressly reserve all Causes of Action against the Entities identified in **Schedule B(iii)** attached hereto.

IV. Causes of Action Related to Accounts Payable Claims

Unless otherwise released under Article IX of the Plan, the Debtors and the Liquidating Trustee, as applicable, expressly reserve and retain all Causes of Action against or related to all Entities who assert or may assert that the Debtors or the Liquidating Trust, as applicable, owe money to them, regardless of whether such Entity is expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto.

V. Causes of Action Related to Deposits, Adequate Assurance, and Other Collateral Postings

Unless otherwise released under Article IX of the Plan, the Debtors and the Liquidating

³ The ADR Procedures shall mean the procedures for alternative dispute resolution approved pursuant to the *Order Authorizing the Debtors to Establish Alternative Dispute Resolution Procedures for Resolution of Certain Litigation Claims and Granting Related Relief* [Docket No. [2389].

⁴ **[NTD]**: To discuss post-confirmation role of ADR Procedures.]

Trustee, as applicable, expressly reserve and retain all Causes of Action based in whole or in part upon any and all postings of security deposits, adequate assurance payments, or any other type of deposit, prepayment, or collateral, regardless of whether such posting of security deposit, adequate assurance payment, or any other type of deposit, prepayment, or collateral is expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto.⁵

VI. Causes of Action Related to Disputed Claims

Unless otherwise specifically released under Article IX of the Plan, settled pursuant to Bankruptcy Rule 9019, or compromised, transferred, or assigned under the Plan or the Third-Party Sale Procedures, the Debtors expressly reserve and retain all rights, claims, defenses, and Causes of Action against any Holder of a Claim seeking to collect a distribution from or assert other rights against the Debtors or the Liquidating Trustee, including, but not limited to, those claims, defenses, and Causes of Action arising from severance payments paid to certain former Yellow employees, whether at law or equity, under any theory and of any nature whatsoever, unless and until each of such Holder's Claims become Allowed Claims, regardless of whether such rights, claims, or Causes of Action are expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto.

VII. Causes of Action Related to Contract and Leases

Unless otherwise released under Article IX of the Plan or assigned or transferred to a Purchaser pursuant to the Third-Party Sale Transaction Documents, the Debtors or the Liquidating Trustee, as applicable, expressly reserve and retain all claims and Causes of Action against any Entity, based in whole or in part upon any and all contracts and leases to which any Debtor is a party, regardless of whether such claims or Causes of Action are expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto. Furthermore, all such claims and Causes of Action are reserved and retained unless otherwise released under separate written agreement executed by the Debtors for: (a) overpayments, back charges, duplicate payments, improper holdbacks, deposits, warranties, guarantees, indemnities, recoupment, or setoff; (b) wrongful or improper termination, suspension of services or supply of goods, or failure to meet other contractual or regulatory obligations; (c) failure to fully perform or to condition performance on additional requirements under contracts with any one or more of the Debtors before the assumption or rejection, if applicable, of such contracts; (d) payments, deposits, holdbacks, reserves, or other amounts owed by any creditor, utility, supplier, vendor, insurer, surety, factor, lender, bondholder, lessor, or other party; (e) any liens, including mechanic's, artisan's, materialmen's, possessory, or statutory liens held by any one or more of the Debtors; (f) environmental or contaminant exposure matters against landlords, lessors, environmental consultants, environmental agencies, or suppliers of environmental services or goods; (g) counterclaims and defenses related to any contractual obligations; (h) any turnover actions arising under section 542 or 543 of the Bankruptcy Code; and (i) unfair competition, interference

⁵ For the avoidance of doubt, the Debtors reserve all rights with respect to any deposit provided in accordance with the *Final Order (A)(I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (B) Granting Related Relief* [Docket No. 534] or otherwise provided as "adequate assurance of payment" (as that term is used by Section 366 of the Bankruptcy Code).

with contract or potential business advantage, breach of contract, infringement of intellectual property, or any business tort claims.

VIII. Causes of Action Related to Taxes, Fees, and Tax or Fee Refunds or Credits

Unless otherwise released under Article IX of the Plan or assigned or transferred to a Purchaser pursuant to the Third-Party Sale Transaction Documents, the Debtors or the Liquidating Trustee, as applicable, expressly reserve and retain all claims and Causes of Action against or related to all Entities that owe or that may in the future owe money related to tax or fee refunds, credits, overpayments, recoupments, offsets, or other claims that may be due and owing to the Debtors or Liquidating Trust, regardless of whether such claims or Causes of Action are expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto. Furthermore, the Debtors expressly reserve and retain all Causes of Action against or related to all Entities who assert or may assert that the Debtors owe tax obligations to them, regardless of whether such Causes of Action are expressly identified in the Plan, this Plan Supplement, or any amendments hereto or thereto.

IX. Causes of Action Related to Liens

Unless otherwise released under Article IX of the Plan or assigned or transferred to a Purchaser pursuant to the Third-Party Sale Transaction Documents, and/or any other order of this Bankruptcy Court, the Debtors and the Liquidating Trustee, as applicable expressly reserve and retain all Causes of Action based in whole or in part upon any and all liens regardless of whether such lien is specifically identified in the Plan, this Plan Supplement, or any amendments hereto or thereto.

Schedule B(i)**Claims Related to Insurance Contracts and Policies**

Name of Counterparty	Nature
ACE American Insurance Company 1133 Avenue of the Americas, 32nd Floor New York NY 11036	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Ace Insurance Company of the Midwest c/o Chubb Customer Services 436 Walnut St WA04F Philadelphia PA 19106	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Allianz US Risks US Insurance Company 225 West Washington Street, Suite 1800 Chicago IL 60606	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Allied World Assurance Company (US) Inc. 199 Water Street , 24th Floor New York NY 10038	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Arch Specialty Insurance Company 210 Hudson Street; Suite 300 Jersey City NJ 07311-1107	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Aria (SAC) Ltd 50 Cedar Avenue Hamilton HM 11 Bermuda	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Aspen American Insurance Co 499 Capitol Boulevard 8th Floor New Jersey City NJ 7310	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Axis Insurance Company 111 South Wacker Drive, Suite 3500 Chicago IL 60606	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Beazley Insurance Co. 30 Batterson Park Road Farmington CT 6032	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Berkshire Hathaway Specialty Insurance Company 1314 Douglas Street, Suite 1400 Omaha NE 68102	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Bridgeway Insurance Company 555 College Road East Princeton NJ 08543-5241	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Canopuis US Insurance, Inc. 200 South Wacker Drive Suite 950 Chicago IL 60606	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS

Name of Counterparty	Nature
Continental Casualty Company 125 Broad Street – 8th Floor New York NY 10004	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Convex Insurance UK Limited 52 Lime Street London England EC3M 7AF	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Crum & Forster Specialty Insurance Company -Executive Risk 305 Madison Avenue Morristown NJ 7962	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Endurance American Ins Co 1221 Avenue of The Americas New York NY 10020	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Federal Insurance Co 202B Hall's Mill Road Whitehouse Station NJ 8889	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
General Star Indemnity Company 400 Atlantic Street, 9th Floor Stamford CT 6901	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Hiscox Syndicates The St. Botolph Building 138 Houndsditch London England EC3A 7AG	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Homeland Ins. Company of NY 275 Madison Ave #902 New York NY 10022	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Homeland Insurance Company of New York 605 Highway 169 North, Suite 800 Plymouth MN 55441	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
IFG Companies 100 Pearl Street Hartford CT 6103	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Illinois Union Insurance Company 525 W. Monroe Street, Suite 400 Chicago IL 60661	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
James River Insurance Company 6641 W Broad St; 300 Richmond VA 23230	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Kinsale Insurance Company PO Box 17008 Richmond VA 23226	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS

Name of Counterparty	Nature
Landmark American Insurance Co 945 East Paces Ferry Rd., Suite 1800 Atlanta GA 30326-1160	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Liberty Mutual Insurance 175 Berkeley St Boston MA 2116	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Markel American Ins Co 4521 Highwoods Parkway Glen Allen VA 23060	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Markel Bermuda 2 Front Street Hamilton HM 11 Bermuda	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Mosaic Insurance 141 Front Street Hamilton Bermuda HN19	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
National Casualty Company 1100 Locust St Des Moines IA 50391	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
National Union Fire Ins Co of PA 1271 Ave of Americas, FL 37 New York NY 10020	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
New Mexico Mutual c/o Corporate Governance Department P. O. Box 27825 Albuquerque NM 87125	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Ohio Bureau of Workers' Compensation 30 W Spring St Columbus OH 43215	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Old Republic Insurance Co 191 North Wacker Drive, Suite 1000 Chicago IL 60606	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Old Republic Residual Market Svs. PO Box 9325 Minneapolis IL 55440-9325	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
RSUI Indemnity 945 East Paces Ferry Rd., Suite 1800 Atlanta GA 30325	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Starr Surplus Lines Insurance Company 399 Park Ave; 2nd Floor New York NY 10022	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS

Name of Counterparty	Nature
State Fund, Small Commercial Service Center 1020 Vaquero Circle Vacaville CA 95688	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Travelers Indemnity Company - RMD Missouri 940 West Port Plaza Suite 450 St. Louis MO 63146	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
Travelers Insurance Company PO Box 5600 Hartford CT 6012	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
TSW Management Services, Inc 187 King Street South Suite 205 Waterloo ON N2L 3L3	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
US Specialty Ins Co 13403 Northwest Freeway Houston TX 77040	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS
XL Specialty Ins Co 100 Constitution Plaza, 13th Floor Hartford CT 6103	CLAIMS RELATED TO INSURANCE POLICIES AND SURETY BONDS

Schedule B(ii)**Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation**

Party	Address	Nature
Central States, Southeast and Southwest Areas Pension Fund	Counsel to Central States, Southeast and Southwest Areas Pension Fund SULLIVAN · HAZELTINE · ALLINSON LLC William D. Sullivan (No. 2820) William A. Hazeltine (No. 3294) 919 North Market Street, Suite 420 Wilmington, DE 19801 bsullivan@sha-llc.com whazeltine@sha-llc.com	All claims and Causes of Action (in law or equity), including, without limitation, any defenses, cross claims, and counterclaims related to or arising under such entities' prepetition or postpetition relationship with the Debtors, including, but not limited to those arising from or related to the ruling of the United States Court of Appeals for the Third Circuit [Case No. 25-1421; Docket No. 110].
Freight Drivers and Helpers 557 Pension, International Association of Motor City Machinists Pension Fund, Management Labor Pension Fund Local 1730, Mid-Jersey Trucking Industry & Teamsters Local 701 Pension and Annuity Fund, New York State Teamsters Conference Pension & Retirement Fund, Road Carriers Local 707 Pension Fund, Teamsters Local 617 Pension Plan, Teamsters Local 641 Pension Plan, Trucking Employees of North Jersey Pension Fund, and Western Pennsylvania Teamsters and Employers Pension	-and- Brad R. Berliner, Esq. Andrew J. Herink, Esq. Daniel Sullivan, Esq. 8647 W. Higgins Road Chicago, IL 60631 bberliner@centralstatesfunds.org aherink@centralstatesfunds.org dsulliva@centralstatesfunds.org	
	Counsel to New York State Teamsters Conference Pension & Retirement Fund, Trucking Employees of North Jersey Pension Fund, Management Labor Pension Fund Local 1730 and Teamsters Local 617 Pension Plan	
	SULLIVAN · HAZELTINE · ALLINSON LLC William D. Sullivan (No. 2820) William A. Hazeltine (No. 3294) 919 North Market Street, Suite 420 Wilmington, DE 19801 bsullivan@sha-llc.com whazeltine@sha-llc.com -and-	

	<p>Maria Kotsiras POTTER ANDERSON & CORROON LLP 1313 N. Market Street 6th Floor Wilmington, DE 19801 kgood@potteranderson.com mkotsiras@potteranderson.com</p> <p>Eric Winston QUINN EMANUEL URQUHART & SULLIVAN, LLP 865 S. Figueroa Street, 10th Floor Los Angeles, CA 90017 ericwinston@quinnemanuel.com</p> <hr/> <p>Counsel to the Pension Benefit Guaranty Corporation</p> <p>KAREN L. MORRIS General Counsel KARTAR S. KHALSA Deputy General Counsel KIMBERLY NEUREITER Assistant General Counsel DESIREE M. AMADOR SHARI D. WILLIAMS Attorneys Office of the General Counsel PENSION BENEFIT GUARANTY CORPORATION 445 12th Street, SW Washington, D.C. 20024 Stark.Rebecca@pbgc.gov efile@pbgc.gov</p>	
Central Pennsylvania Teamsters Defined Benefit Plan, IBT Local 705, IAM National Pension Fund, New England Teamsters Pension Plan, Teamsters Joint Council # 83 of Virginia Pension	<p>Counsel to Local 705 International Brotherhood of Teamsters Pension Fund</p> <p>William D. Sullivan William A. Hazeltine SULLIVAN HAZELTINE ALLINSON LLC 919 North Market Street, Suite 420 Wilmington, DE 19801 bsullivan@sha-llc.com</p>	<p>All claims and Causes of Action (in law or equity), including, without limitation, any defenses, cross claims, and counterclaims related to or arising under such entities' prepetition or postpetition relationship with the Debtors, including, but not limited to those arising from or related to the <i>Debtors' Seventh Omnibus</i></p>

<p>Fund, Teamsters Local 710, and Teamsters Pension Trust Fund of Philadelphia & Vicinity (together the “<u>Non-SFA MEPP Parties</u>” to the “<u>Non-SFA MEPP Proceedings</u>”)</p>	<p>whazeltine@sha-llc.com</p> <p>-and-</p> <p>John S. Delnero PEDERSEN HOUP 161 North Clark Street, Suite 2700 Chicago, IL 60601 jdelnero@pedersenhoupt.com</p> <p>-and-</p> <p>Patrick N. Ryan 200 W. Adams Street, Suite 1825 Chicago, IL 60606 pryan@baumsigman.com</p> <hr/> <p>Counsel to Teamsters Joint Counsel #83 of Virginia Pension Fund</p> <p>Kevin Mann 1105 North Market Street Suite 901 Wilmington, DE 19801 kmann@crosslaw.com</p> <p>-and-</p> <p>Eric G. Serron Joshua R. Taylor Caitlin R. Tharp STEPTOE LLP 1330 Connecticut Ave., NW Washington, D.C. 20036 eserron@steptoe.com jrtaylor@steptoe.com ctharp@steptoe.com</p> <hr/> <p>Counsel to IAM National Pension Fund</p> <p>William D. Sullivan William A. Hazeltine SULLIVAN HAZELTINE ALLINSON LLC 919 North Market Street, Suite 420 Wilmington, DE 19801</p>	<p><i>(Substantive) Objection to Proofs of Claim for Withdrawal Liability</i> [Docket No. 2595] and the Preliminary MEPP Opinion [Docket No. 6682].</p>
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	<p>bsullivan@sha-llc.com whazeltine@sha-llc.com</p> <p>-and-</p> <p>Edward J. Meehan Samuel I. Levin emeehan@groom.com slevin@groom.com</p> <hr/> <p>Counsel to Teamsters Local 710 Pension Fund, Central Pennsylvania Teamsters Pension Fund Defined Benefit Plan</p> <p>Michael Busenkell GELLERT SEITZ BUSENKELL & BROWN, LLC 1201 North Orange Street, Suite 300 Wilmington, DE 19801 mbusenkell@gsbblaw.com</p> <p>-and-</p> <p>James S. Beall WILLIG, WILLAMS & DAVIDSON 1845 Walnut Street, 24th Floor Philadelphia, PA 19103 jbeall@wwdlaw.com</p> <hr/> <p>Counsel to the Teamsters Pension Trust Fund of Philadelphia & Vicinity</p> <p>Joseph H. Huston, Jr. STEVENS & LEE, P.C. 919 North Market Street, Suite 1300 Wilmington, DE 19801 joseph.huston@stevenslee.com</p> <p>-and-</p> <p>John C. Kilgannon, Esquire 1500 Market Street, East Tower Suite 1800 Philadelphia, PA 19012 john.kilgannon@stevenslee.com</p>	
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	<p>Counsel to New England Teamsters Pension Fund and Central Pennsylvania Teamsters Pension Fund Defined Benefit Plan</p> <p>Mark D. Collins Cory D. Kandestin RICHARDS, LAYTON & FINGER, P.A. One Rodney Square 920 North King Street Wilmington, Delaware 19801 collins@rlf.com kandestin@rlf.com</p> <p>-and-</p> <p>Dennis F. Dunne MILBANK LLP 55 Hudson Yards New York, New York 10001</p> <p>-and-</p> <p>Andrew M. Leblanc Erin E. Dexter Melanie Westover Yanez MILBANK LLP 1850 K St. NW, Suite 1100, Washington, DC 20006</p>	
<p>International Brotherhood of Teamsters, Teamsters National Freight Industry Negotiating Committee, Teamsters Local No. 696, Teamsters Local No. 795, and Teamsters Local No. 41</p>	<p>Counsel to the International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee</p> <p>Michael E. Amash, KS Bar No. 22998 Nathan A. Kakazu, KS Bar No. 28276 BLAKE & UHLIG, P.A. 6803 West 64th Street, Suite 300 Overland Park, Kansas 66202 mea@blake-uhlig.com nak@blake-uhlig.com</p> <p>David O'Brien Suetholz General Counsel</p>	<p>All claims and Causes of Action (in law or equity), including, without limitation, any defenses, cross claims, and counterclaims related to or arising under such entities' prepetition or postpetition relationship with the Debtors, including, but not limited to those arising from or related to the pending action before the United States Court of Appeals for the Tenth Circuit [Case No. 24-3111] and the pending WARN Disputes pending before the United States District</p>

	<p>International Brotherhood of Teamsters 25 Louisiana Ave, NW Washington DC 20001</p> <p>Edward M. Gleason, Jr. HERZFELD SUETHOLZ GASTEL LENISKI AND WALL PLLC 128 C. Street NW Washington, D.C. 20001 ed@hsglawgroup.com</p> <p>Yingtao Ho Emma Woods THE PREVIAN LAW FIRM, S.C. 310 W Wisconsin Ave, Suite 100MW Milwaukee, Wisconsin 53203 yh@previant.com emw@previant.com</p>	<p>Court for the District of Delaware [Case No. 25-0377].</p>
The Avoidance Actions	Various	<p>All claims and Causes of Action (in law or equity), including, without limitation, any defenses, cross claims, and counterclaims related to or arising under such entities' prepetition or postpetition relationship with the Debtors, including, but not limited to those arising from or related to certain claims and Causes of Action pursuant to sections 547 through 550 of the Bankruptcy Code.</p>

Schedule B(iii)

Claims Related to Accounts Receivable

Yellow Corp and Subsidiaries**Customer Balances Greater Than \$50K**

(\$ USD)

Customer Name	Ult Parent	10/20 AR Balance
WALMART TRUCK & DRIVER	5819	\$ 3,018,630
CH ROBINSON	5074	1,675,406
DAIMLER PRODUCTION NATL	5858	1,244,816
DFAS INDIANAPOLIS	5851	620,881
SPAN ALASKA	582G	388,647
TURN 5 INC	08VF	346,008
DIAGEO % EXEL TRANSPORTATION	567W	231,719
AIR SYSTEM COMPONENTS	5852	208,311
MY SPA COVER % TREND TRANSPORT	524Z	142,497
MIZCO INTL INC	ST1003	130,387
RYDER (5011) 8101 DR PEPPER	51QH	109,540
VWR INTERNATIONAL/AVANTOR INC	5991	105,510
FLORIDA SPA COVERS	99YG	105,059
FREIGHTZ TRANSPORTATION INC	50YB	92,244
NORFOLK SOUTHERN CORP	5168	72,385
XINHUA XIN INC	LA3096396	73,113
RUDE TRANSPORTATION COMPANY	SCRUDE	68,533
MATTEL_% RYDER	5011	56,300
Total		\$ 8,689,987